

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
(Greenbelt Division)

In re:	:	
	:	
MICHAEL A. VANISON,	:	Case No. 22-1-6340-LS
	:	Chapter 13
Debtor.	:	
	:	

**TRUSTEE’S OBJECTION TO DEBTOR’S
CHAPTER 13 PLAN DATED DECEMBER 12, 2022**

Timothy P. Branigan, Chapter 13 trustee in the above-captioned case (“Trustee”), pursuant to section 1325 of the Bankruptcy Code and Bankruptcy Rule 3015(f) objects to confirmation of the Debtor’s Chapter 13 plan December 12, 2022 (the “Plan”). In support of his opposition, the Trustee respectfully represents the following:

1. The Debtor commenced this case under Chapter 13 on November 14, 2022. The Plan proposes to pay \$1,200.00 monthly for 60 months for a gross funding of \$72,000.00.
2. The Plan is underfunded due to the Internal Revenue Service’s priority claim in the amount of \$9,474.99.
3. The Debtor has failed to provide the Domestic Support Obligation Affidavit as requested by the Trustee. At this time, the Debtor has failed to fully cooperate with the Trustee as required under section 521(a)(3) of the Bankruptcy Code.
4. The Debtor has not adequately proved ownership and the market value of scheduled real property. The Plan does not satisfy the requirements of section 1325(a)(4) of the Bankruptcy Code.

5. The Debtor has not provided and/or filed all applicable federal, state, and local tax returns as required by section 1308. Accordingly, the Debtor has not satisfied the requirements of section 1325(a)(9) of the Bankruptcy Code.

6. Accordingly, the Plan should not be confirmed.

PLEASE TAKE NOTICE THAT *THIS OBJECTION MUST BE RESOLVED AT LEAST 2 BUSINESS DAYS PRIOR TO THE CONFIRMATION HEARING.* AFTER THAT TIME, THE TRUSTEE MAY DECLINE TO ACCEPT MATERIALS THAT HE HAS REQUESTED FROM THE DEBTORS. THE TRUSTEE MAY DECLINE TO DISCUSS THE CASE AT THE CONFIRMATION HEARING. THE DEBTORS SHOULD EXPECT THAT ANY UNRESOLVED OBJECTION WILL BE HEARD BY THE COURT.

Respectfully submitted,

January 9, 2023

/s/ Timothy P. Branigan
Timothy P. Branigan (Fed. Bar No. 06295)
Chapter 13 Trustee
9891 Broken Land Parkway, #301
Columbia, Maryland 21046
(410) 290-9120

Certificate of Service

I hereby certify that the following persons are to be served electronically via the CM/ECF system:

Bennie Brooks, Esquire

I caused a copy of the pleading above to be sent on January 11, 2023 by first-class U.S. mail, postage prepaid to:

Michael A. Vanison
1408 Early Oaks Lane
Capitol Heights, MD 20743

/s/ Timothy P. Branigan
Timothy P. Branigan (Fed. Bar No. 06295)